

BEFORE THE
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA
DOCKET NO. 2019-390-E

IN RE: Ganymede Solar, LLC,)	
)	
Petitioner,)	
)	
Dominion Energy South Carolina,)	ANSWER TO AMENDED PETITION
Inc.,)	
)	
Respondent.)	
)	

Pursuant to S.C. Code Ann. Regs. §§ 103-826, 103-828, and other applicable rules of practice and procedure of the Public Service Commission of South Carolina (“Commission”), Dominion Energy South Carolina, Inc. (formerly South Carolina Electric & Gas Company) (“DESC”) hereby answers the Amended Petition filed by Ganymede Solar, LLC (“Ganymede”), on January 24, 2020, in the above-referenced docket (the “Amended Petition”).¹ Ganymede filed its original Petition on December 20, 2019 (the “Original Petition”), and DESC filed its Answer to the same on January 21, 2020 (the “Original Answer”).

RESPONSE TO ALLEGATIONS OF AMENDED PETITION

Although the Amended Petition contains certain clarifications, it does not introduce new substantive issues for this Commission to address. As such, DESC hereby incorporates by reference the Original Answer as if it were repeated verbatim herein; provided, however, that DESC acknowledges the Amended Petition correctly states (i) the amount of the milestone

¹ To the extent any material allegation of the Amended Petition requires a specific admission or denial, and the same is not addressed herein, such allegation is specifically denied. DESC stipulates that the interconnection agreement in dispute speaks for itself, and DESC has no knowledge of Ganymede’s inability to obtain financing or whether such financing could even be completed in accordance with Ganymede’s requested relief.

payments under the interconnection agreement, and (ii) that Ganymede has yet to execute a power purchase agreement with DESC.

Specifically, the Original Answer presented this Commission with arguments and supporting facts detailing, among other things:

- Ganymede's failure to provide this Commission with an appropriate basis for relief;
- Language in (i) Ganymede's interconnection agreement, (ii) the Commission-approved South Carolina Generator Interconnection Procedures, Forms, and Agreements, (iii) South Carolina law, and (iv) Federal Energy Regulatory Commission precedent that—in each case—prohibits Ganymede's requested relief; and
- The complete absence of any “public interest” that would justify this Commission granting Ganymede's requested relief—a standard imposed upon this Commission by the South Carolina General Assembly in S.C. Code § 58-27-980.

CONCLUSION

For the reasons stated above and in the Original Answer—which is incorporated herein by reference—the relief requested in the Amended Petition should be denied.

[SIGNATURE PAGE FOLLOWS]

Respectfully Submitted,

/s/ J. Ashley Cooper

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Cayce, South Carolina
January 31, 2020

CERTIFICATE OF SERVICE

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This 31st day of January, 2020